

## TITLE V PERMIT STATEMENT OF BASIS

<b>Facility Name:</b> CalsonicKansei North America, Inc.
<b>City:</b> Lewisburg
<b>County:</b> Marshall

<b>Date of Application (short form):</b> January 11, 2010
<b>Date Revised Application:</b> February 23, 2011
<b>Date 2<sup>nd</sup> Revised Application:</b> May 25, 2011
<b>Date Application Deemed Complete:</b> May 25, 2011

<b>Emission Source Reference No:</b> 59-0061
<b>Permit No.:</b> 563336

### INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V Operating Permit which is being renewed for this facility. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V Operating Permit is to consolidate and identify existing state and federal air requirements applicable to **CalsonicKansei North America, Inc.** and to provide practical methods for assuring compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit renewal. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

### Acronyms

PSD - Prevention of Significant Deterioration  
NESHAP - National Emission Standards for Hazardous Air Pollutants  
NSPS - New Source Performance Standards  
MACT - Maximum Achievable Control Technology  
NSR - New Source Review  
GHGs - Greenhouse Gases

## I. Identification Information

### A. Source Description

The facility manufactures and surface coats plastic component parts for the automotive industry. The following source(s) exist at this facility:

59-0061-01: Surface coating operation with manual and automated spray booths for plastic automotive parts with filter pad control for particulate.

59-0061-03: Surface coating system. Consists of 2 automated spray booths with drying system and thermal oxidizer control for VOC, filter pad control for particulate.

59-0061-23: Wave soldering operation.

### B. Facility Classification

#### 1. Attainment or Non-Attainment Area Location

Area **is** designated as an attainment area for all criteria pollutants.

#### 2. Company **is** located in a *Class II* area.

### C. Regulatory Status

#### 1. PSD/NSR

This facility **is not** a major source under PSD.

#### 2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	Yes	No	Yes
PM <sub>10</sub>	Yes	No	Yes
SO <sub>2</sub>	Yes	No	Yes (insignificant)
VOC	Yes	Yes	No
NO <sub>x</sub>	Yes	No	Yes (insignificant)
CO	Yes	No	Yes (insignificant)
CO <sub>2</sub> e	Yes	No	Yes
Individual HAP	Yes	Yes	No
Total HAPs	Yes	Yes	No

#### 3. MACT Standards

This facility **is** a major source for HAPs and **is** subject to the following NESHAP (MACT standard):

40 CFR 63, Subpart PPPP - Surface Coating of Plastic Parts and Products (promulgated 4/19/04).

4. Program Applicability

Are the following programs applicable to the facility?

PSD (no)

NESHAP (yes)

NSPS (no)

II. Compliance Information

A. Compliance Status

Is the facility currently in compliance with all applicable requirements?  
**Compliance is currently being evaluated.**

Are there any applicable requirements that will become effective during the permit term? no

III. Other Requirements

A. Emissions Trading

The facility **is not** involved in an emission trading program.

B. Acid Rain Requirements

This facility **is not** subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases

Not Applicable

D. Greenhouse Gas (GHG)

This facility **is not** a major source of greenhouse gas emissions.

IV. Public Participation Procedures

Notification of this draft permit was sent to the following environmental agencies:

1. EPA - Region IV

2. State of Alabama

3. Metropolitan Nashville/Davidson County Health Dept. - Air Pollution Control Division

4. Columbia Environmental Field Office

V. Project Description

Title V Operating Permit No. 563336 represents the second renewal of the original Title V Permit No. 548550 issued May 29, 1998. Since the first Title V renewal 555389, the following changes/modifications have occurred:

**Administrative Permit Amendment #2 (Issued June 1, 2009) TO TITLE V PERMIT 555389**

In a letter dated May 7, 2009, the company requested a change in the responsible official from Vitto Raffo to Ken Ham. The amendment consisted of a new cover page for Title V Permit Number 555389 to incorporate the company's change in responsible official.

**Administrative Permit Amendment #1 (Issued April 21, 2008) TO TITLE V PERMIT 555389**

In a letter dated April 9, 2008, the company requested a change in the responsible official from Ron Gordon to Vitto Raffo. In a letter dated April 17, 2008, the company requested a change in the company name from Kantus Corporation to CalsonicKansei North America, Inc. The amendment consisted of a new cover page for Title V Permit Number 555389 to incorporate the company's name change and the change in responsible official.

**Minor Permit Modification #3 (Issued July 31, 2007) TO TITLE V PERMIT 555389**

In a minor permit application dated May 22, 2007, the company requested to add four additional wave soldering lines to emission source 23 that would be vented through the same stacks as the current processes. The changes are as follows:

1. For permit condition E6-1 the VOC limit from minor modification #2 has been changed from 7.56 tons during any period of twelve consecutive months to 16.26 tons during any period of twelve consecutive months.
2. For permit condition E6-2 the solder usage, lead emissions, and 12-consecutive month limit have been changed from 3.5 tons per month, 5.25 pounds per month, and 0.0315 tons during any 12-consecutive month period to 8.5 tons per month, 12.75 pounds per month, and 0.0765 tons during any 12-consecutive month period.

**Minor Permit Modification #2 (Issued July 10, 2006) TO TITLE V PERMIT 555389**

In a minor permit application dated April 28, 2006, the company requested to increase the annual allowable VOC emissions for source 23. The changes are as follows:

1. The cover page includes the date and description of Minor Modification #2.
2. Condition E2 of Title V Permit No. 555389 has been updated to Condition E2(M2) to reference the modified condition E6-1(M2) for recordkeeping purposes.
3. Condition E6-1 of Title V Permit No. 555389 has been replaced by Condition E6-1(M2). Condition E6-1(M2) increases the annual allowable VOC limit for Source 59-0061-23 from 3.4 tons per 12-consecutive-month period to 7.56 tons per 12-consecutive-month period as a result of an increase in flux usage at the source.

**Minor Permit Modification #1 (Issued January 3, 2006) TO TITLE V PERMIT 555389**

In a minor permit application dated October 11, 2005, the company requested to increase the annual allowable VOC emissions for source 03. The changes are as follows:

1. The cover page includes the date and description of Minor Modification #1.
2. Condition E5-2 of Title V Permit No. 555389 has been replaced by Condition E5-2(M1). Condition E5-2(M1) increases the annual allowable VOC limit for Source 59-0061-03 from 2.9 tons per 12-consecutive-month period to 5.0 tons per 12-consecutive-month period.

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**VI. Modifications to Permit No. 563336**

Title V Operating Permit No. 563336 was issued on March 5, 2013. Since issuance of Title V Operating Permit No. 563336, the following changes/modifications have occurred:

**Administrative Permit Amendment #1 TO TITLE V PERMIT 563336**

In a letter dated April 22, 2014, the company requested a change in the responsible official to Roger Murphree. Only the first page of the permit was changed.